IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS LUFKIN DIVISION

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Plaintiff X X X CTVIL ACTION NO
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V. X CIVIL ACTION NO.
X
BRYAN COLLIER X
MATT GROSS X
BILLY LEWIS X MOTION FOR APPOINTMENT
BRUCE JOHNSON & OF COUNSEL
KENNETH HUTTO X
JAMES KENT X
BLAKE NORMAN X
JEQUILLE REED X
JEQUILLE REED GEORGE JANSKY.JR KRYSTEL HOHENBRINK BAMUEL DOMINEY CORA SIMS, AND X EASTERN DISTRICT COURT X AUG 0 3 2000
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BAMUEL DOMINEY X
CORA SIMS, AND X AUG N 2 2000
TEXAS DEPARTMENT OF CRIMINAL JUSTICE.
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DEPUTY
PLAINTIFF'S MOTION FOR APPOINTMENT OF COUNSEL

TO THE HONORABLE JUDGE OF THE DISTRICT COURT:

Plaintiff, Jesse Paul Skinner, pro se, moves for an order appointing counsel on behalf of himself and (Class Members) in this case. In support of this motion, Plaintiff will show the court the following;

PURSUANT TO 28 U.S.C.§1915(e)(1)

1. Plaintiff is unable to afford counsel. He has requested leave to proceed in forma pauperis on behalf of himself and on behalf of all similarly-situated persons at the (TDCJ-CID) Eastham Unit.

- 2. Plaintiff's imprisonment will greatly limit his ability to litigate. The issues involved in this case are complex, and will require significate research and investigation. Without counsel, Plaintiff will not be able to fairly and adequately represent the interest of the class. Plaintiff have no interests contrary to those of the class members.
- 3. Plaintiff's purpose to seek (Representation) to represent Plaintiff and a class composed of all inmates who currently are, who in the future will be,incarcerated at the Eastham Unit, and who are subjected to (TDCJ's) policy and practice of failing to regulate Unconstitutional Conditions and the High apparent indoor temperature in the housing and facilities areas. Plaintiff is typical of class members.
- 4. A trial in this case will likely involve conflicting testimony, and counsel would better enable Plaintiff and class membersto present evidence and cross examine witnesses.
- 5. Plaintiff and subclass members have serious medical conditions that incrase our risk of heat-related illness, injury,or death (including,but not limited to,suffering from obesity,diabetes,hypertension,cardiovascular disease,psychiatris conditions,cirrhosis of the liver,chronic obstructive pulmonary disease,and asthma that will limit our ability to represent Plaintiff and class members.

WHEREFORE, Plaintiff prays that this Honorable Court grant his request that counsel be appointed to present him and class members Constitutional Rights to be free of Cruel and Unusual Punishment.

Respectfully submitted,

Jesse Paul Skinner, pro se TDDO# 599362/Eastham 2665 Prison Rd.#1 Lovelady.Texas 75851

Certificate of service

42 U.S.C.A. §1746

I declare under penalty of purjury that the foregoing are true and correct, and that a copy of Plaintiff's motion for appointment of counsel was served on the Office of the Clerk Eastern District Court of Texas Lufkin Division on this 30 of the Clork Eastern District Court of Texas Lufkin Division on this 30 of the Clork Eastern District Court of Texas Lufkin Division on this 30 of the Clork Eastern District Court of Texas Lufkin Division on the Clork Eastern District Court of Texas Lufkin Division on the Clork Eastern District Court of Texas Lufkin Division on the Clork Eastern District Court of Texas Lufkin Division on the Clork Eastern District Court of Texas Lufkin Division on the Clork Eastern District Court of Texas Lufkin Division on the Clork Eastern District Court of Texas Lufkin Division on the Clork Eastern District Court of Texas Lufkin Division on the Clork Eastern District Court of Texas Lufkin Division on the Clork Eastern District Court of Texas Lufkin Division on the Clork Eastern District Court of Texas Lufkin Division on the Clork Eastern District Court of Texas Lufkin Division on the Clork Eastern District Court of Texas Lufkin Division on the Clork Eastern District Court of Texas Lufkin Division on the Clork Eastern District Court of Texas Lufkin Division on the Clork Eastern District Court of Texas Lufkin Division on the Clork Eastern District Court of Texas Lufkin Division on the Clork Eastern District Court of Texas Lufkin Division on the Clork Eastern District Court of Texas Lufkin Division D

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Mr.Jesse P.Skinner TDCJ# 599362/Eastham 2665 Prison Rd.#1 Lovelady,Texas 75851

July 30,2018

Office of the Clerk United States District Court Eastern District of Texas 104 North Third Street Lufkin.Texas 75901

RE: Jesse Paul Skinner V. Bryan Collier .et al, Plaintiff's Motion For Appointment of Counsel:

Dear Hon.Clerk:

Please find the original and one copy enclosed of Plaintiff's Motion for Appointment of Counsel. Please inform Plaintiff of any movement by the court.

Also, forward (Docket Sheet) to Plaintiff with the case number in the above civil action.

I thank you for your time and attention to this matter! I Await your response. I Remain.

Bincerely.

Jesse P.Skinner

pro se

cc/jps/apl/file

Mr.Jesse P.Skinner TDCJ# 599362/Eastbam 2665 Prison Rd.#1 Lovelady,Texas 75851

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Office of the Clerk United States District Court Eastern District of Texas 104 North Third Street Lufkin, Texas 75901

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